

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the matter of)	
)	
Review of the Commission's Part 95 Personal)	WT Docket No. 10-119
Radio Service Rules)	

Date: June 23, 2017

**PETITION FOR RECONSIDERATION
Regarding Revised Rule § 95.1763(c)**

In the Report and Order for WT Docket No. 10-119, it was stated in Paragraph 74 that the FCC has decided to "decline FM modulation..." for CBRS because "alternative modulation techniques would be incompatible with the existing equipment base."

The benefits resulting from using FM in CBRS, especially in terms of quality of service and user experience, seem to be widely recognized. And we at Cobra Electronics completely agree that the need for backward compatibility cannot be ignored.

To realize the benefits of FM while maintaining backward compatibility, Cobra Electronics would like to respectfully request that the FCC give consideration to a more specific proposal in which AM would continue to be the mandatory modulation scheme for CB radios, and FM would be permitted as an optional modulation scheme for the existing 40 channels.

In other words, all CB radios would be required to have 40 AM channels as they do today, but some CB radios could offer an optional mode that would change the modulation scheme to FM on these same 40 channels. This would allow users to enjoy the benefits of FM, if they so choose, while ensuring every new radio sold could communicate with all the existing radios in the field.

It is worth mentioning that this dual-modulation approach is not new. It has been used in other countries very successfully for many years with no performance degradation or issues of channel interference. And we at Cobra strongly believe a dual-modulation scheme for CBRS would also be widely accepted and much appreciated by CB users here in the United States.

Respectfully submitted,



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